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VIA ECF

Hon. Cathy Seibel, U.S.D.J.
The Hon. Charles L. Brieant, Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

Re: REQUEST TO EXTEND DISCOVERY CUT-OFF DATES
Shea v. Village of Pomona, et al., Civ. No. 7:18-cv-11170-CS

Dear Judge Seibel:

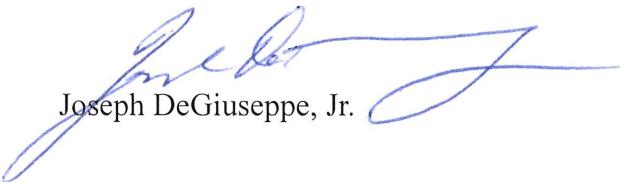
My firm represents the Defendants in the above-cited action. This letter confirms the parties' joint request extend the following discovery cut-off dates set forth in Civil Case Plan and Discovery Schedule, entered on February 27, 2019 as per the following proposed extensions:

1. Fact Discovery Cut-off date of 6/28/2019: Extend to 08/09/2019.
2. Expert Discovery Cut-off Date of 8/27/2019: Extend to 09/09/2019.
3. Status Conference on 09/17/2019: No Change Requested.

This Request is based on the unanticipated delay in the holding of the Court-ordered mediation session, and the remaining time it will take to complete the parties' production of requested electronic discovery. This is the parties' first request for an extension of the Scheduling Order. Thank you for Your Honor's consideration of this request. I hereby confirm that a copy of this letter has been served upon Plaintiff's counsel through both facsimile and via email.

Very truly yours,

Bleakley Platt & Schmidt, LLP



Joseph DeGiuseppe, Jr.

cc: Michael H. Sussman, Esq.